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March 7, 2019
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

RE: Interactive Services Network, Inc.
EB Docket No. 06-36; CY2018

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Interactive Services Network, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon R. Warren

Sharon R. Warren
Consultant

cc: Adriana Humoller – ISN (Via E-Mail)
tms: FCx1901

SW/mp

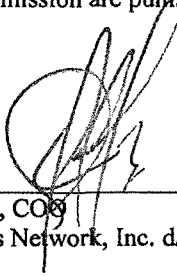
**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for:	Calendar Year 2018
Name of Company covered by this certification:	Interactive Services Network, Inc. d/b/a IPFone
Form 499 Filer ID:	819392
Name of Signatory:	Julio Abdala
Title of Signatory:	Chief Operating Officer

I, Julio Abdala, certify and state that:

1. I am COO of Interactive Services Network, Inc. d/b/a IPFone and, acting as an agent of the company, I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Julio Abdala, COO
ISN Services Network, Inc. d/b/a IPFone

Date

03/06/19

Exhibit A
Statement of CPNI Procedures and Compliance
Interactive Services Network, Inc. d/b/a ISN Telcom
Calendar Year 2018

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB DOCKET 06-36

Interactive Services Network, Inc. d/b/a ISN Telcom

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (CY 2018)

Interactive Services Network, Inc. d/b/a ISN Telcom ("ISN" or "Company") provides local exchange and long distance services via traditional wireline and Voice over Internet Protocol (VoIP) services to residential and business customers. The Company does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If ISN elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

ISN bills its customers directly and has taken steps to secure CPNI and call detail records, and manage the release of such information in accordance with FCC rules. The Company has put into place processes to safeguard customer CPNI and call detail information from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to CPNI.

The Company Customer Care Representatives are provided detailed personal instructions both verbally and in writing. The Company requires participation in role-playing groups with the supervisor of each area and other representatives in which different common customer situations are dramatized. This includes requests for call detail and other information constituting CPNI. Training includes working beside a trained representative to listen to customer-Company conversations and listen to the decisions made by the trained representative. The Company also has a system for monitoring calls for quality purposes. Specific information regarding CPNI and corresponding instructions are distributed to all representatives who discuss matters with customers.

Call detail information is provided over the telephone to customers only if customer provides a 4-digit PIN to the Company's Customer Care Representative, or the customer can provide call detail for the call in question. If the customer cannot provide the password and the customer's question does not fall into the exception where the call detail information is provided by the customer to the Customer Service Representative, then call detail can only be provided by calling the customer at the telephone number of record.

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Interactive Services Network, Inc. d/b/a ISN Telcom

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (CY 2018)
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The company has launched a new customer portal that provides on-line access to account information, including call detail, invoices and payment history. Customers have access with a unique personal PIN provided by the company at their request. Customers may pay bills via the Company website or through the new portal. Bills are sent to customers either via U.S. mail or e-mail, based on the customer's selection. To pay invoices on-line the customer must have the invoice in hand and input the amount of the bill and amount being paid.

The Company does not have retail locations and therefore does not disclose CPNI in-store.

The Company notifies customers via a previously established email address or mails to the customer address of record, all notifications regarding account changes (without revealing the changed information or sending the notification to the new account information), password changes, change in a response to a back-up means of authentication, change or creation of an address of record other than at service initiation.

The Company does have procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach. The Company maintains a record of any breaches discovered and notifications made to the United States Secret Service and FBI. The customer's electronic record is updated with information regarding notifications on CPNI breaches.

The Company has not taken any actions against data brokers in the last year.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.